

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BRIGHT IMPERIAL LIMITED,

Plaintiff,

v.

RT MEDIASOLUTIONS, S.R.O., *et al.*,

Defendants.

Civil Action No. 1:11-cv-00935-LO-TRJ

STIPULATION TO EXTEND DEADLINES PENDING SETTLEMENT

IT IS HEREBY STIPULATED by and between Plaintiff Bright Imperial Limited (“Bright,” “Plaintiff”) and Defendants RT MediaSolutions, s.r.o., Swiss Media Factoring, GmbH, and Walter Olligschläger (collectively, “Defendants”) through their respective counsel, as follows:

WHEREAS, the discovery and trial deadlines in this case were extended pursuant to the stipulation of the parties and the Court’s orders of November 27, 2012, and December 12, 2012;

WHEREAS, the parties have already signed a settlement that will terminate Plaintiff’s claims against Defendants and lead to a prompt resolution of this action;

WHEREAS, the parties are in the process of finalizing the escrow agreement that is required as part of the signed settlement agreement;

WHEREAS, due to the international nature of this dispute, and the nature of the escrow agreement required by the settlement agreement, the parties are still finalizing that escrow agreement;

WHEREAS, in reaching their settlement agreement, it was and is of fundamental importance to the parties to avoid additional costs and burdens of litigation to the extent possible;

WHEREAS, the parties seek to extend all deadlines in this action by seven (7) days in order to finalize and sign the escrow agreement and avoid additional costs and burdens of litigation;

NOW, THEREFORE, the parties stipulate that all deadlines in this action are extended by seven (7) days.

IT IS SO STIPULATED.

DATED: January 17, 2013

Respectfully submitted,

/s/ Sheldon M. Kline

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Attorneys for Defendants

IT IS SO ORDERED.

DATED: 1/18/13

By 
The Honorable Liam O'Grady
United States District Court Judge